

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NAVIGATOR CAPITAL PARTNERS, L.P., on behalf of  
itself and all others similarly situated,

Plaintiff,

- against -

BEAR STEARNS ASSET MANAGEMENT, BEAR,  
STEARNS SECURITIES CORP., THE BEAR  
STEARNS COMPANIES INC., BEAR, STEARNS &  
CO. INC., RALPH CIOFFI, RAYMOND  
MCGARRIGAL AND MATTHEW TANNIN,

Defendants,

- and -

BEAR STEARNS HIGH-GRADE STRUCTURED  
CREDIT STRATEGIES, L.P.,

Nominal Defendant.

PLEASE TAKE NOTICE THAT, upon the Declaration of Andrew J. Entwistle dated September 28, 2007 and the exhibits attached thereto, the accompanying Memorandum of Law in Support of Plaintiff's Motion to Remand, and all prior proceedings and pleadings herein, the undersigned attorneys for Plaintiff Navigator Capital Partners, L.P. will move this Court, before the Honorable Alvin K. Hellerstein, in the United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be set by the Court, for an Order remanding this action to the New York State Supreme Court, County of New York, pursuant to 28 U.S.C. §§ 1447 and 1453, together with an award of costs and attorneys' fees to be determined by this Court, and any

other relief this Court deems just and proper.

Dated: New York, New York  
September 28, 2007

ENTWISTLE & CAPPUCCI LLP

/s/ Andrew J. Entwistle

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